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REMARKS

Claim 1 is revised in a further effort to define patentable subject matter over the art of record. Claim 20 is cancelled without prejudice. Claims 1-15 remain, with no claim previously rejected.

Claim 1 stands rejected as being unpatentable over *Brotman* (5,917,890) in view of *Meador* (5,638,425) and in view of *Brotman* (5,917,889). The applicant respectfully traverses that rejection as possibly applied to currently-amended Claim 1.

Claim 1 is revised to recite a method including receiving an initial input comprising either a first spoken alphabetic character input comprising plural spoken alphabetic characters, or a first keypad entry of plural alphabetic characters using a DTMF key tone for each entered character. If the initial input comprises the spoken character input, the claimed method processes that spoken character input substantially as set forth in Claim 1 before the present amendments. However, if the initial input was performed using keypad entry, the method comprises playing back the keypad entry to the user and querying the user to determine whether the entered keypad character input is correct. If the method receives user input indicating that the played-back keypad entry matches the entered keypad character input, the method determines alphabetic character combinations and phonetic alphabetic character combinations that correspond to the DTMF characters input by the user. The method next prompts the user to speak the previously-entered alphabetic characters or phonetic versions of those alphabetic characters, and compares that spoken input to identify the determined alpha-phonetic character combinations that correspond to the DTMF characters input by the user. Following that step, the method prompts the user to verify the identified character string as the correct character string.

Amended Claim 1 thus a method of alphabetic speech recognition that functions with initial input comprising <u>spoken</u> alphabetic character input or <u>keypad entry</u> of alphabetic characters, and that processes either kind of initial input to determine character strings that match the respective inputs.

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Support for the method of amended Claim 1 appears in the specification, for example, at Page 4, Lines 14-20. Input comprising either phonetic/non-phonetic alphabetic characters or keypad entries including DTMF numbers corresponding to alphabetic characters is discussed at Page 10, Lines 25-29. The flow chart in Fig. 3 includes, at block 312, different branched outputs for alphabetic and DTMF inputs; and Page 14, Lines 19-30 discuss operation if the initial input from the user was performed using keypad entries such as DTMF character input. Page 15, Line 25-Page 16, Line 2 summarizes the operation whether the user initially enters alphabetic characters as spoken or phonetic versions or initially enters alphabetic characters via DTMF character entry.

None of the cited references discloses or suggests a method meeting the individual elements, and the overall combination of elements, now recited in Claim 1. Brotman '889 requires the user to enter a sequence of telephone keys producing a DTMF string corresponding to alphabetic characters (Column 4, Lines 16-20), as mentioned in the applicant's remarks in the last response. Brotman '890 discloses the opposite approach, namely, receiving an uttered character and then prompting the user to enter an input if necessary for disambiguating the received character. Meador appears of more general relevance to the overall claimed combination.

The undersigned is mindful of the Examiner's admonition that one cannot show nonobviousness by attacking references individually, where a rejection is based on a combination of references. Nonetheless, the teachings for alleged obviousness must come from those individual references. If the sum total of the teachings from those references would not have placed one of ordinary skill in possession of the *claimed* invention, without direction from the applicant, those references fail the test of obviousness under 35 USC 103.

Amended Claim 1 sets forth a method of alphabetic speech recognition that receives an initial input comprising either spoken character input or DTMF keypad input. The method further recites specific and detailed elements for recognizing and disambiguating the initial input, whether spoken or keypad. Those specific and detailed elements, particularly in the functional interrelationships required by Claim 1, are not met by Brotman '889, Brotman '890, and Meador. The applicant respectfully submits that the

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applied art, considered in any plausible combination, would not have taught or suggested that method of amended Claim 1 to one of ordinary skill in the art. For that reason, Claim 1 and the claims depending therefrom are patentable over the applied art.

The foregoing is submitted as a complete response to the Office Action identified above. The applicant submits that the present application is in condition for allowance and solicits a notice to that effect.

Respectfully submitted, MERCHANT & GOULD, P.C.

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